

Docket CG 06-181
CGB-CC-0142

Wildfire Global Church
3032 Primrose Cir.
Abilene, TX 79606

November 18, 2011
Disability Rights Office
Office of the Secretary
Federal Communications Commission
Attention: Disability Rights Office
Room 3-B431
445 12th St. SW
Washington, DC 20554

Dear Disability Rights Office:

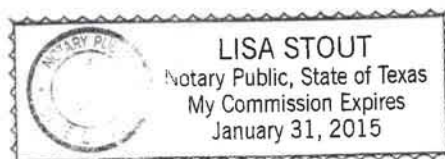
My name is Henry Flint and I am the Overseer of Wildfire Global Church. Previously, you have exempted our church for closed captioning (CASE/REFERENCE # CGB-CC-0142). Nothing has changed for us as a church since our past exemption, yet we received a letter from you stating that we need to add closed captioning to our broadcasts. We financially cannot do so. We are all non salaried and receive no source of income through the church. The funds for our present time broadcasting are provided by the staff's other vocations outside of the church and just cover the \$140/week that it costs for both broadcasts. Therefore, we have no financial statements. To add closed captioning would cost anywhere from \$150-\$250 extra a week increasing the cost of the broadcast by over 200% which is a critical blow to our staff financially. I do not ask for money on our broadcasts and never in 10+ years of providing a broadcast has anyone of our staff members asked for money from the viewing audience. We are non-partnered, non-sponsored and are not a commercial based broadcaster. Our church consists of 2-8 people and the moneys received in tithes and offerings barely cover the cost of renting out a building. Please consider these issues in your ruling of exemption. I do appreciate and thank you for the time you took to read this letter and hope to receive a response shortly.

Regards,

Henry Flint
Henry Flint

Overseer
Wildfire Global Church
State of Texas
County of Taylor

Henry Flint personally appeared before me
& signed this letter in front of me.



L. Stout
Exp. 1-31-15

November 18, 2011

Disability Rights Office
Office of the Secretary
Federal Communications Commission
Attention: Disability Rights Office
Room 3-B431
445 12th St. SW
Washington, DC 20554

To Whom It May Concern,

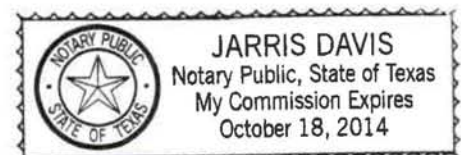
My name is Crystal King and I am the Senior Pastor of Wildfire Global Church, located in Abilene, TX. We received a letter from you ordering us to produce closed captioning broadcasts. You exempted us in 2010 (CASE/REFERENCE #CGB-CC-0142) Nothing has changed financially for us as a church since then. We simply cannot financially support a broadcast with closed captioning. We are not a commercial based broadcaster so we have no way of getting funds to provide closed captioning. I am non salaried myself and receive no income by being the Sr. Pastor of this church outside of the fact that Jesus Christ and His truth is being preached. The funds for broadcasting are provided by the ministerial staff's other vocations outside of the church and the extra \$150-\$250 per broadcast to add the closed captioning to our program is above and beyond the 2% cap that your rule states. It would increase the cost of our broadcast 200% and we already as a staff are putting all of our extra funding outside of our necessities towards this present broadcast. We have no business' sponsorships, yet alone sponsorships in general, no partners or extra funding. We as a church do no source of fund raising. We as a ministerial staff do not ask for or solicit funds/fund raising/ monetary gifts or donations for copies of our previous broadcasts. Everything, if anything at all is requested outside of prayer from our listeners is provided for free. We have no extra source of income whatsoever so therefore we are unable to provide you a financial statement that you require. The only funds that we are provided with is an unstable income provided through tithes and offerings of our church congregation that can range from 2-8 people total... these are not 2-8 families this is the number of our congregation. We put none of our tithes and offerings into the broadcast because the finances barely cover our church bills (electricity, utilities, rent etc.) With this being said, I am petitioning you to excuse us from closed captioning, seeing as how we simply cannot afford it. Please consider these issues before putting such a burden on me and our church.

Respectfully,

Crystal King
Sr. Pastor/Overseer
Wildfire Global Church

J.D.
Jarris Davis

WILDFIRE GLOBAL CHURCH
3032 PRIMROSE CIR.
ABILENE, TX 79606



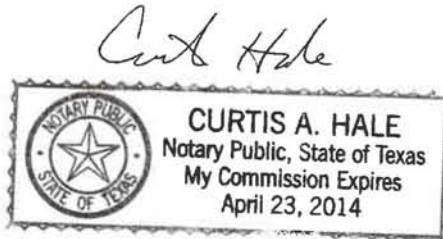
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Washington, DC 20554

To Whom It May Concern,

My name is Joshua Ray and I am the Broadcasting Director of Wildfire Global Church. We received a letter from you ordering us to produce closed captioning broadcasts. You exempted us previously (CASE/REFERENCE #CGB-CC-0142). We are not a commercial based broadcaster so we have no way of getting funds to provide closed captioning. I am non salaried myself and receive no income whatsoever for filming the broadcast. I have no hired staff, seeing as how I cannot pay anyone to help. The cost of the closed captioning will be more than both broadcasts combined aired on KTAB-TV, Abilene, TX. To send out our broadcasts a week before air date to get the closed captioning would cause high stress on the ministerial staff at the church because the sermons are not rehearsed and are generally off the cuff. I am provided no outline of sermons and these messages are God inspired truths that even the ministers themselves sometimes cannot predict. I thank you for your time. I do appreciate the response that I received on an earlier inquiry I sent out. Please consider these issues in your ruling of our exemption.

Respectfully,



Joshua Ray
Joshua David Ray
Director of Broadcasting
Wildfire Global Church



Federal Communications Commission
Washington, D.C. 20554

Received & Inspected

DEC 2 - 2011

FCC Mail Room

October 25, 2011

Case Identifier: CGB-CC-0142

Wildfire Global Church
3032 Primrose Dr.
Abilene, TX 79606

Dear Wildfire Global Church,

This is to advise you that by the attached Order, the Federal Communications Commission ("FCC" or "Commission") recently reversed the closed captioning exemption that you received in September 2006 for your program. The FCC issued the attached Order in response to an Application for Review (filed on October 12, 2006) that had challenged your exemption. Under the terms of the Order, your petition for exemption from the Commission's closed captioning rules will be dismissed on January 18, 2012, which is 90 days after the release date of the attached Order.

If you wish to continue receiving a closed captioning exemption, you must file a new petition requesting an exemption for this programming by January 18, 2012, which is 90 days from the release of the attached Order. Once the Commission receives your petition, the programming for which you seek an exemption shall be considered exempt from the closed captioning requirements while the new petition is pending. **Note that if you do not file a new petition by January 18, 2012, you must begin providing closed captions for this programming by January 19, 2012.**

If you choose to file a new petition, your petition must include up-to-date evidence, supported by affidavit, demonstrating that it would be economically burdensome to provide closed captioning on the specific programming for which an exemption is sought. Below we have described some of the requirements for filing a new petition. We advise you to carefully review the attached Order and corresponding Commission rules which describe the requirements in detail.¹

Your petition should contain current and detailed documentation to support a claim that providing closed captions on this video programming would result in a "significant difficulty or expense" as defined by the following criteria: (1) the nature and cost of the closed captions for the programming; (2) the impact on the operation of the provider or program owner; (3) the financial resources of the provider or program owner; and (4) the type of operations of the provider or program owner.

In order to make the above showing that providing captioning would be economically burdensome, you must:

- provide documentation of your financial status to demonstrate your inability to afford closed captioning;
- verify that you have obtained information about the costs of captioning your specific program;

¹ 47 CFR § 79.1(f)(2)-(3).

- verify that you have sought closed captioning assistance from your video programming distributor and note the extent to which such assistance has been provided or rejected; and
- indicate whether you have sought additional sponsorship sources or other sources of revenue for captioning, and show that, even if these efforts have not been fruitful, you do not otherwise have the means to provide captioning for your programming.

You may describe other factors that you deem relevant to an exemption determination, as well as any alternatives that could be a reasonable substitute for the closed captioning requirement. Your petition should contain a specific list of names of the program(s) for which you are seeking an exemption.

It is your responsibility to determine exactly what documentation and evidence is needed to make the above showing in your particular case, and what form your petition will take. The FCC does not provide a form for this purpose. Failure to support your exemption request with adequate explanation and evidence to make such a showing will result in dismissal of your request.

Your petition, as well as any supporting financial information provided, will be available for public inspection. If your petition contains confidential information, you may request "confidential treatment," *i.e.*, that it not be shared with members of the public, pursuant to Commission rules. See 47 C.F.R. § 0.459. Along with your request for confidential treatment, you must also submit a second version of your petition with the confidential information redacted. The redacted version will be publicly disclosed. If your request for confidential treatment is granted, the "public version" of your petition must still contain sufficient documentation to support your claim that closed captioning would be economically burdensome. Your petition must include this documentation so that the public understands the basis for your exemption request and can comment on its merits.

If the FCC's Consumer and Governmental Affairs Bureau (CGB) determines that your petition provides sufficient information upon which to make a determination of whether or not to grant a closed captioning exemption, your petition will be placed on public notice in CG Docket No. 06-181 at <http://fjallfoss.fcc.gov/ecfs/>. Members of the public will then have 30 days to file comments on and/or oppositions to your petition, after which you will have 20 days to respond. At the end of this timeframe, CGB will review your petition, along with information provided in any comments and responses received, to determine the extent that providing captioning would be economically burdensome for you. If CGB denies your new request for an exemption, you will have 90 days from the date of the denial to begin captioning.

If you have additional questions pertaining to the filing of an exemption request, please contact the Commission's Disability Rights Office at captioningexemption@fcc.gov.

Joel Gurin
Chief, Consumer and Governmental Affairs Bureau

Enclosure